# **Exhibit C**

To The Declaration of Benjamin Kleinman In Support of Kelora Systems, LLC's Opposition to Defendants' Claim Construction Brief and Motion For Summary Judgment of Invalidity and Non-Infringement

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Appendix C to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Target

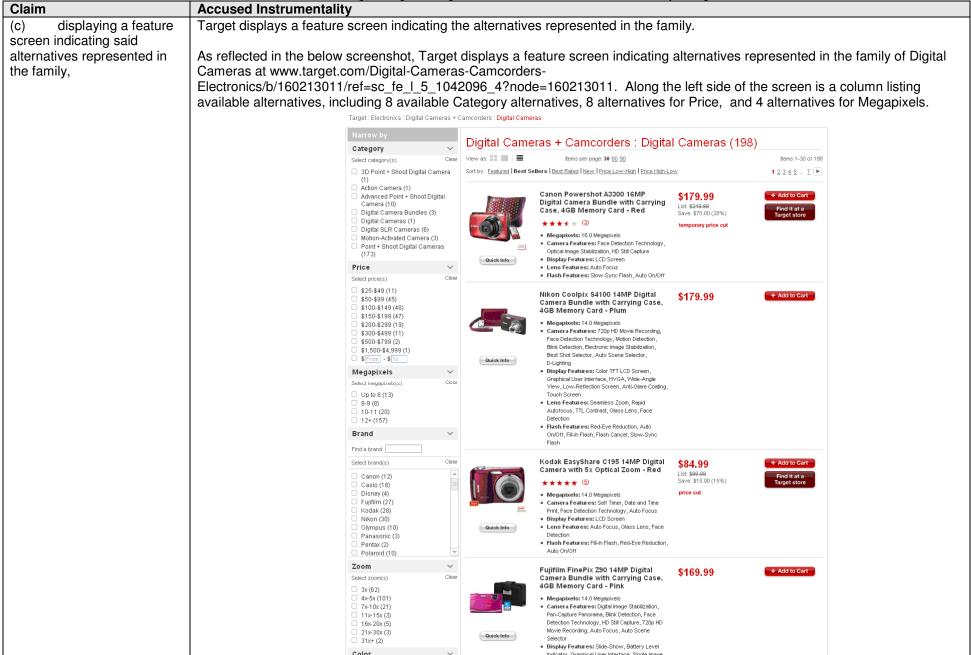
## I. ACCUSED INSTRUMENTALITY: TARGET.COM

Claim	Accused Instrumentality				
Claim 1					
1. A method for assisting a user in identifying a subfamily of items within a family of items said method performed with a server connected to a client computer through a computer network, comprising the steps of:	Target performs a method for assisting a user in identifying a subfamily of items within a family of items, the method performed with a server connected to a client computer through a computer network.  In particular, for example, Target servers that are connected to clients over the Internet at target.com perform this method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including: Furniture, Electronics, and Swimwear, among others.  Free Shipping Every Day — Over 500,000 items ship free with \$50 order. Easy.				
	Search Find a Store Help Sign In   New Guest?   My Account   RedCards # Shopping Cart				
	GiftCards Gift Registries + Lists Photo Pharmacy WeeklyAd				
	Women   Men   Baby   Kids   Shoes   Beauty   Home   Bed + Bath   Kitchen + Dining   Furniture   Patio   Toys   Bectronics   Movies   See More				
	daily deals One Day Only. Always Free Shipping > Here Comes the Deal   Save on Wedding Season Faves >				
	Weekly Ad Bright garden basics priced right.  Our Lowest Prices of the Season Save up to 30% on select patio updates: Shop Now >				
	Furniture Save up to 30% on select updates.  SAVE \$300 + 67				
	Women Ahhhnew summer looks are here.				
	Electronics Check out the latest and greatest.				
	Swimwear Sale on select suits, sandals + more.  Patio Furniture > Patio Décor > Outdoor Fireplaces >				
	Gifts for Grads  *Save 5%-90%. Sale ends 5/28/11. Some exclusions apply. See offer details > Finds tons of smart gift ideas.				
	Free Shipping Every Day on over 500,000 items when you spend \$50. Easy.				

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Claim	Accused Instrumentality			
(a) providing a computer	Target provides via www.target.com a computer readable data file of stored information representing at least one family of items,			
readable data file of stored	the data file identifying at least one alternative for each item.			
information representing at				
least one family of items,	As can be seen in the illustrative screenshots, one of the many families of items is Digital Cameras. See www.target.com/Digital-			
said data file identifying at	Cameras-Camcorders-Electronics/b/160213011/ref=sc_fe_l_5_1042096_4?node=160213011, reachable from by selecting			
least one alternative for each	Electronics, Digital Cameras + Camcorders, then Digital Cameras.			
item,				
(b) reading said data	Target reads the data file.			
file,				
	For example, it does so in the process of serving the page listing Digital Cameras at www.target.com/Digital-Cameras-			
	Camcorders-Electronics/b/160213011/ref=sc_fe_l_5_1042096_4?node=160213011.			

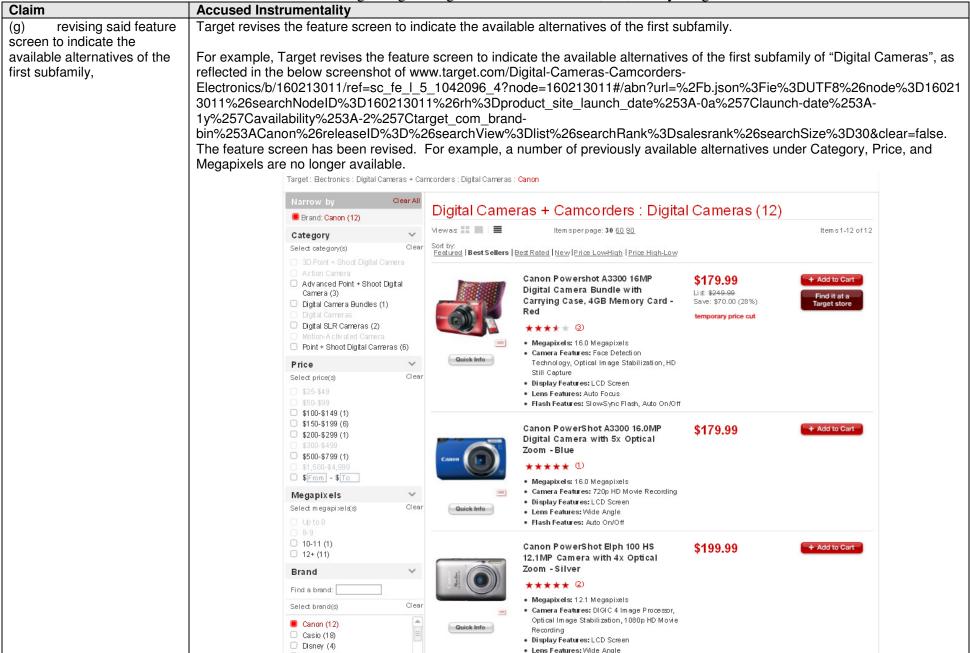
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Claim	Accused Instrumentality
(d) accepting a first selection criteria of at least	Target accepts a first selection criteria of at least one alternative.
one alternative,	For example, a selection criteria corresponding to the "Canon" alternative under the heading "Brand" is accepted by Target at www.target.com. The selection criteria is used in step (e), below.
(e) determining a first subfamily of items wherein	Target determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria.
each said item in the first subfamily satisfies said first selection criteria,	For example, Target determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the "Canon" alternative.
(f) determining available alternatives	Target determines available alternatives represented in the first subfamily.
represented in the first subfamily,	For example, Target determines available alternatives in the first subfamily of "Digital Cameras" satisfying the first selection criteria corresponding to the "Canon" alternative. The results of the determination are used in step (g), below.

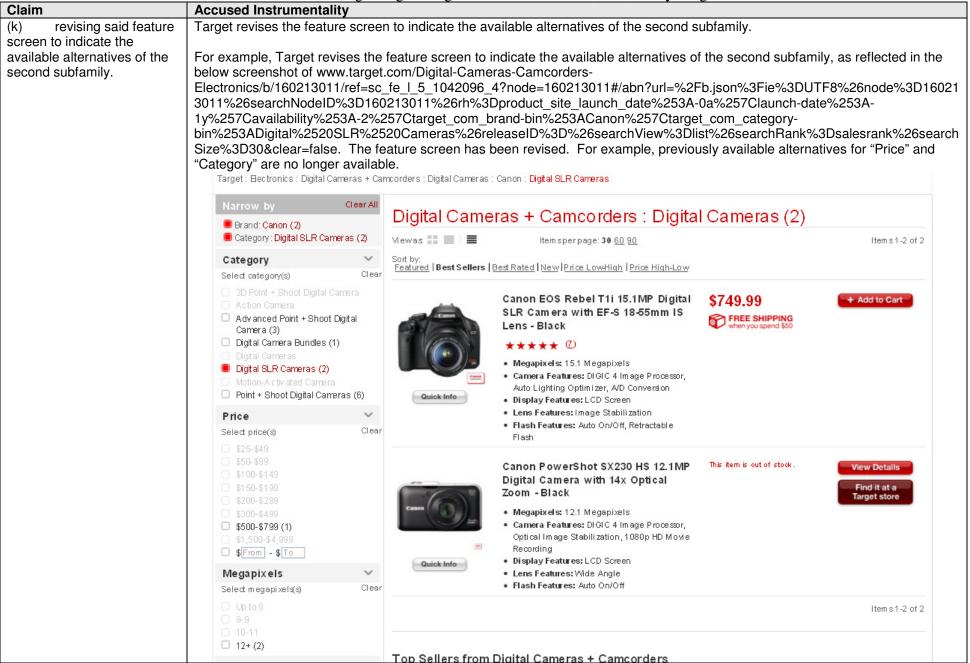
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Claim	Accused Instrumentality
(h) accepting a second selection criteria from said client computer via said computer network at said	Target accepts a second selection criteria from the client computer via the computer network at the server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen.
server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria	For example, a second selection criteria corresponding to the "Digital SLR Cameras" alternative under the "Category" heading and the "Canon" alternative of the first selection criteria is accepted by Target at www.target.com. This second selection criteria is used in step (i), below. This second-selection criteria is reflected in the URL below, which includes a "Canon" segment (highlighted in yellow), plus a "Digital SLR Cameras" segment (highlighted in Green):
plus at least one alternative selected from the revised feature screen,	www.target.com/Digital-Cameras-Camcorders-Electronics/b/160213011/ref=sc_fe_l_5_1042096_4?node=160213011#/abn?url=%2Fb.json%3Fie%3DUTF8%26node%3D16021 3011%26searchNodeID%3D160213011%26rh%3Dproduct_site_launch_date%253A-0a%257Claunch-date%253A-1y%257Cavailability%253A-2%257Ctarget_com_brand-bin%253ACanon%257Ctarget_com_category-bin%253ADigital%2520SLR%2520Cameras%26releaseID%3D%26searchView%3Dlist%26searchRank%3Dsalesrank%26search Size%3D30&clear=false
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	Target determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.  For example, Target determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the "Canon" and "Digital SLR Cameras" alternatives.
(j) determining available alternatives represented in the second subfamily, and	Target determines available alternatives represented in the second subfamily.  For example, Target determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.

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Claim	Accused Instrumentality
Claim 2	
<ol> <li>The method of claim</li> <li>wherein each family has at</li> </ol>	Target performs the method of claim 1 (see above) wherein each family has at least one feature associated therewith.
least one feature associated therewith and further comprising the step of	For example, each of the families (and subfamilies) illustrated above includes a "Category" feature.
displaying at least one grouping wherein each said grouping comprises one	Target displays at least one grouping wherein each grouping comprises one of the features visually related to respective alternatives.
of said features visually related to respective alternatives.	For example, as shown in the screenshots above, Target displays a grouping including the "Category" feature visually related to the respective alternatives for that feature, such as "Action Camera", "3D Point + Shoot Digital Camera", "Advanced Point + Shoot Digital Camera", and other alternatives.

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Claim	Accused Instrumentality				
Claim 9	Accused instrumentality				
9. A method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network:	In particular, for example, Target servers that are accessible over the Internet at www.target.com perform this method. In example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of item including: Furniture, Electronics, and Swimwear, among others.				
	Weekly Ad Digit Grads  One Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping >  Weekly Ad Digit grade Some Day Only. Always Free Shipping Every Day on over 500,000 items when you spend \$60' Easy.				
(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,	Target provides via www.target.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.  As can be seen in the illustrative screenshots, one of the many families of items is Digital Cameras. See www.target.com/Digital-Cameras-Camcorders-Electronics/b/160213011/ref=sc_fe_l_5_1042096_4?node=160213011, reachable from by selecting Electronics, Digital Cameras + Camcorders, then Digital Cameras.				
(b) reading said data file,	Target reads the data file.  For example, it does so in the process of serving the page listing Digital Cameras at www.target.com/Digital-Cameras-Camcorders-Electronics/b/160213011/ref=sc_fe_I_5_1042096_4?node=160213011.				

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Claim	Acquaed Instrumentality	gement	1 01 0.3. 1 atent 0,273,821 U	y raiget		
Claim	Accused Instrumentality	الم مالا	weather was a second of the third for	المسالم المسالم	data is suit	ut to a diam's committee
(c) displaying a feature screen indicating said alternatives represented in	Target displays a feature screen indicating the alternatives represented in the family wherein data is output to a client computer via the computer network.					
the family wherein data is	As reflected in the below screenshot, Target displays a feature screen indicating alternatives represented in the family of Digital					
output to a client computer	Cameras at www.target.com/Digital-Cameras-Camcorders-					
via said computer network,	Electronics/b/160213011/ref=sc_fe_I_5_1042096_4?node=160213011. In so doing, it outputs, via the internet, to a client					
	computer, data. Along the left side of the screen is a column listing available alternatives, including 8 available Category alternatives, 8 alternatives for Price, and 4 alternatives for Megapixels, among other alternatives.					
	Target : Electronics : Digital Came	eras + Camcorders	rs:Digital Cameras			
	Narrow by	Digita	tal Cameras + Camcorders : Digital	L Cameras (198)		
	Category Select category(s)	~	#	r cameras (100)	Items 1-30 of 198	
	□ 3D Point + Shoot Digital Cam		Featured   Best Sellers   Best Rated   New   Price Low-High   Price High-Lov	<u>w</u>	1 2 3 4 5 7 <b>&gt;</b>	
	(1)	al	Canon Powershot A3300 16MP Digital Camera Bundle with Carrying	\$179.99	+ Add to Cart	
	Digital Camera Bundles (3) Digital Cameras (1)	18	Case, 4GB Memory Card - Red	List: \$249.99 Save: \$70.00 (28%)	Find it at a Target store	
	□ Digital SLR Cameras (6) □ Motion-Activated Camera (3)	70	Megapixels: 16.0 Megapixels	temporary price cut		
	Point + Shoot Digital Camera (173)	s	Camera Features: Face Detection Technology, Optical Image Stabilization, HD Still Capture			
	Price	Qu	Display Features: LCD Screen     Lens Features: Auto Focus			
	Select price(s)	Clear	Flash Features: Slow-Sync Flash, Auto On/Off			
	\$25-\$49 (11) \$50-\$99 (45) \$100-\$149 (48) \$150-\$199 (47)		Nikon Coolpix S4100 14MP Digital Camera Bundle with Carrying Case, 4GB Memory Card - Plum	\$179.99	+ Add to Cart	
	\$200-\$299 (19) \$300-\$499 (11) \$500-\$799 (2) \$1,500-\$4,999 (1)		Megapixels: 14.0 Megapixels     Camera Features: 720p HD Movie Recording, Face Detection Technology, Motion Detection, Blink Detection, Betronic image Stabilization, Best Shot Selector, Auto Sene Selector,			
	□ \$From - \$To	Qu	D-Lighting			
	Megapixels Seleut megapixels(s)	Clear	<ul> <li>Display Features: Color TFT LCD Screen, Graphical User Interface, HVGA, Wilde-Angle View, Low-Reflection Screen, Anti-Glare Coating.</li> </ul>			
	Up to 8 (13)		Touch Screen  • Lens Features: Seamless Zoom, Rapid			
	□ 10-11 (20)		Autofocus, TTL Contrast, Glass Lens, Face Detection			
	12+ (157)  Brand	~	Flash Features: Red-Eye Reduction, Auto On/Off, Fill-In Flash, Flash Cancel, Slow-Sync			
	Find a brand:		Flash			
	Select brand(s)	Clear	Kodak EasyShare C195 14MP Digital	\$84.99	+ Add to Cart	
	Canon (12)		Camera with 5x Optical Zoom - Red	List: \$99.99 Save: \$15.00 (15%)	Find it at a	
	Casio (18) Disney (4)		Megapixels: 14.0 Megapixels	price cut	raiget store	
	☐ Fujifilm (27) ☐ Kodak (28)	<b>See</b> - <b>See</b>	Camera Features: Self Timer, Date and Time     Print, Face Detection Technology, Auto Focus			
	□ Nikan (30) □ Olympus (10)	Qu	Display Features: LCD Screen     Lens Features: Auto Focus, Glass Lens, Face			
	Panasonic (3)		Detection • Flash Features: Fill-In Flash, Red-Eye Reduction,			
	□ Polaroid (10)		Auto On/Off			
	Zoom Select zoom(s)	Clear	Fujifilm FinePix Z90 14MP Digital Camera Bundle with Carrying Case, 4GB Memory Card - Pink	\$169.99	+ Add to Cart	
	3x (62) 4x-5x (101)		Megapixels: 14.0 Megapixels			
	7x-10x (21) 11x-15x (3) 16x-20x (5)		Camera Features: Digital Image Stabilization,     Pan-Capture Panorama, Blink Detection, Face     Detection Technology, HD Still Capture, 720p HD     Made Reposition 4 May Facus May Seeper			
	21x+30x (3) 31x+ (2)	Qu	Movie Recording, Auto Focus, Auto Scene Selector			
	Color	~	<ul> <li>Display Features: Slide-Show, Battery Level Indicator, Graphical User Interface, Single Image.</li> </ul>			

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Claim	Accused Instrumentality
(d) receiving and accepting a first selection criteria of at least one	Target receives and accepts a first selection criteria of at least one alternative from the client computer, the first selection criteria being received by the server from the client computer via the computer network.
alternative from said client computer, said first selection criteria being received by said server from said client computer via said computer network,	For example, a selection criteria corresponding to the "Canon" alternative under the heading "Brand" is received and accepted by Target at www.target.com. The selection criteria is used in step (e), below.
(e) determining a first subfamily of items wherein	Target determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria.
each said item in the first subfamily satisfies said first selection criteria,	For example, Target determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the "Canon" alternative.
(f) determining available alternatives	Target determines available alternatives represented in the first subfamily.
represented in the first subfamily,	For example, Target determines available alternatives in the first subfamily of "Digital Cameras" satisfying the first selection criteria corresponding to the "Canon" alternative. The results of the determination are used in step (g), below.

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Appendix C to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Target

#### **Accused Instrumentality** Claim Target revises the data for the feature screen to indicate the available alternatives of the first subfamily and outputs the revised (g) revising said data for said feature screen to data for the feature screen to the client computer via the computer network. indicate the available For example, Target revises the data for the feature screen to indicate the available alternatives of the first subfamily of "Digital alternatives of the first Cameras" and outputs that revised data to the client computer via the Internet, as reflected in the below screenshot of subfamily and outputting said revised data for said feature www.target.com/Digital-Cameras-Camcordersscreen to said client Electronics/b/160213011/ref=sc fe | 5 1042096 4?node=160213011#/abn?url=%2Fb.json%3Fie%3DUTF8%26node%3D16021 3011%26searchNodeID%3D160213011%26rh%3Dproduct site launch date%253A-0a%257Claunch-date%253Acomputer via said computer 1y%257Cavailability%253A-2%257Ctarget com brandnetwork, bin%253ACanon%26releaseID%3D%26searchView%3Dlist%26searchRank%3Dsalesrank%26searchSize%3D30&clear=false. The data for the feature screen has been revised. For example, a number of previously available alternatives under Category, Price, and Megapixels are no longer available. The data is output to the client computer via the Internet. Target : Bectronics : Digital Cameras + Camcorders : Digital Cameras : Canon Digital Cameras + Camcorders : Digital Cameras (12) Brand: Canon (12) Viewas == Items1-12 of 12 Item sper page: 30 60 90 Category Select category(s) Clear Featured | Best Sellers | Best Rated | New | Price Low-High | Price High-Low Canon Powershot A3300 16MP \$179.99 Advanced Point + Shoot Digital Digital Camera Bundle with List: \$249.99 Camera (3) Carrying Case, 4GB Memory Card -Save: \$70.00 (28%) Digital Camera Bundles (1) Red temporary price cur □ Digital SLR Cameras (2) \*\*\*\* (3) • Megapixels: 16.0 Megapixels Point + Shoot Digital Cameras (6) . Camera Features: Face Detection Quick Info Technology, Optical Image Stabilization, HD Price Still Capture Select price(s) · Display Features: LCD Screen . Lens Features: Auto Focus . Flash Features: Slow-Sync Flash, Auto On/Off \$100-\$149 (1) \$150-\$199 (6) Canon PowerShot A3300 16.0MP + Add to Cart \$179.99 \$200-\$299 (1) Digital Camera with 5x Optical Zoom - Blue \$500-\$799 (1) SFrom - \$To Megapixels: 16.0 Megapixels · Carnera Features: 720p HD Movie Recording Megapixels Display Features: LCD Screen Clear Select megapixels(s) . Lens Features: Wide Angle · Flash Features: Auto On/Off 10-11 (1) Canon PowerShot Elph 100 HS \$199.99 12+ (11) 12.1MP Camera with 4x Optical Zoom - Silver Brand \*\*\*\* (2) Find a brand: • Megapixels: 12.1 Megapixels Clear Select brand(s) . Carmera Features: DIGIC 4 Image Processor, Optical Image Stabilization, 1080p HD Movie Canon (12) Quick Info Recording Casio (18) • Display Features: LCD Screen Disney (4) . Lens Features: Wide Angle

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Claim	Accused Instrumentality
(h) receiving and accepting a second selection criteria from said client computer via said computer	Target receives and accepts a second selection criteria from the client computer via the computer network, in which the second selection criteria comprises (1) a resubmission by the client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen.
network, in which said second selection criteria comprises (1) a resubmission by said client computer of the alternative	For example, a second selection criteria corresponding to the "Digital SLR Cameras" alternative under the "Category" heading and the "Canon" alternative of the first selection criteria is received and accepted by Target at www.target.com. This second selection criteria is used in step (i), below. This second-selection criteria is reflected in the URL below, which includes a "Canon" segment (highlighted in yellow), plus a "Digital SLR Cameras" segment (highlighted in Green):
or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen,	www.target.com/Digital-Cameras-Camcorders- Electronics/b/160213011/ref=sc_fe_l_5_1042096_4?node=160213011#/abn?url=%2Fb.json%3Fie%3DUTF8%26node%3D16021 3011%26searchNodeID%3D160213011%26rh%3Dproduct_site_launch_date%253A-0a%257Claunch-date%253A- 1y%257Cavailability%253A-2%257Ctarget_com_brand-bin%253ACanon%257Ctarget_com_category- bin%253ADigital%2520SLR%2520Cameras%26releaseID%3D%26searchView%3Dlist%26searchRank%3Dsalesrank%26search Size%3D30&clear=false
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	Target determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.  For example, Target determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the "Canon" and "Digital SLR Cameras" alternatives.
(j) determining available alternatives represented in the second subfamily, and	Target determines available alternatives represented in the second subfamily.  For example, Target determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.

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Appendix C to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Target

#### **Accused Instrumentality** Claim Target revises the data for the feature screen to indicate the available alternatives of the second subfamily and outputs the (k) revising said data for said feature screen to revised data for the feature screen to the client computer via the computer network. indicate the available alternatives of the second For example, Target revises the data for the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of www.target.com/Digital-Cameras-Camcorderssubfamily and outputting said revised data for said feature Electronics/b/160213011/ref=sc fe | 5 1042096 4?node=160213011#/abn?url=%2Fb.json%3Fie%3DUTF8%26node%3D16021 screen to said client 3011%26searchNodeID%3D160213011%26rh%3Dproduct site launch date%253A-0a%257Claunch-date%253A-1y%257Cavailability%253A-2%257Ctarget com brand-bin%253ACanon%257Ctarget com categorycomputer via said computer bin%253ADigital%2520SLR%2520Cameras%26releaseID%3D%26searchView%3Dlist%26searchRank%3Dsalesrank%26search network. Size%3D30&clear=false. The data has been revised. For example, previously available alternatives for "Price" and "Category" are no longer available. The data is output to the client computer via the Internet. Target : Bectronics : Digital Cameras + Camporders : Digital Cameras : Canon : Digital SLR Cameras Clear All Narrow by Digital Cameras + Camcorders : Digital Cameras (2) Brand: Canon (2) Category: Digital SLR Cameras (2) Viewas 📰 🔳 Item sperpage: 30 60 90 Items 1-2 of 2 Category Featured | Best Sellers | Best Rated | New | Price Low-High | Price High-Low Select category(s) Canon EOS Rebel T1i 15.1MP Digital \$749.99 + Add to Cart SLR Camera with EF-S 18-55mm IS Adv anced Point + Shoot Digital Lens - Black Camera (3) Digital Camera Bundles (1) \*\*\*\*\* (2) Megapixels: 15.1 Megapixels Digital SLR Cameras (2) • Camera Features: DIGIC 4 Image Processor, Auto Lighting Optimizer, A/D Conversion Point + Shoot Digital Cameras (6) Display Features: LCD Screen Lens Features: Image Stabilization Price Flash Features: Auto On/Off, Retractable Clear Select price(s) Canon PowerShot SX230 HS 12.1MP This item is out of stock Digital Camera with 14x Optical Find it at a Zoom - Black Target store Megapixels: 12.1 Megapixels Camera Features: DIGIC 4 Image Processor. \$500-\$799 (1) Optical Image Stabilization, 1080p HD Movie Recording SFrom - \$To • Display Features: LCD Screen Quick Info Megapixels · Lens Features: Wide Angle Flash Features: Auto On/Off Clear Select megapixels(s) Item s 1-2 of 2 12+ (2) Top Sellers from Digital Cameras + Camcorders